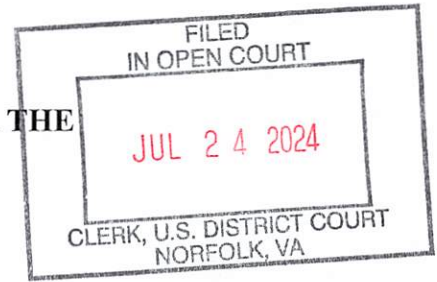


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Norfolk Division



UNITED STATES OF AMERICA

v.

GARY OWENS, JR.,

CRIMINAL NO. 2:24-CR-78

18 U.S.C. § 2251(a) and (e)

Sexual Exploitation of a Minor

(Counts 1, 3, 5, 7, 9, & 11)

18 U.S.C. § 2422(b)

Coercion and Enticement of a Minor

(Counts 2, 4, 6, 8, 10, & 12)

18 U.S.C. § 2251(e)

Attempted Sexual Exploitation of a Minor

(Count 13)

18 U.S.C. § 2252(a)(4)(B) and (b)(2)

Possession of Material Involving the Sexual

Exploitation of Minors

(Count 14)

Criminal Forfeiture

**INDICTMENT**

July 2024 Term—at Norfolk, Virginia

**COUNT ONE**

**(Sexual Exploitation of a Minor)**

THE GRAND JURY CHARGES THAT:

On or about October 31, 2022, in Prince William County and Suffolk, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, GARY OWENS, JR., attempted to and did employ, use, persuade, induce, entice, and coerce a minor, MINOR 1, to engage in sexually

explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and that visual depiction had actually been transported and transmitted using any means and facility of interstate commerce and affecting interstate and foreign commerce, to wit: an image depicting MINOR 1 engaged in sexually explicit conduct, sent using the internet and located on an iPad Pro [S/N Q63N7DPX24].

(All in violation of Title 18, United States Code, Section 2251(a) and (e).)

**COUNT TWO**  
**(Coercion and Enticement of a Minor)**

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about February 20, 2022, and on or about October 31, 2022, in Prince William County and Suffolk, Virginia, and elsewhere within the Eastern District of Virginia, the defendant, GARY OWENS, JR., using any facility and means of interstate and foreign commerce, attempted to and did knowingly persuade, induce, entice, and coerce MINOR 1 who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense, including Title 18, United States Code, Section 2251(a)/(e) (Sexual Exploitation of a Minor).

(All in violation of Title 18, United States Code, Section 2422(b).)

**COUNT THREE**  
**(Sexual Exploitation of a Minor)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 16, 2022, in Suffolk, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, GARY OWENS, JR., attempted to and did employ, use, persuade, induce, entice, and coerce a minor, MINOR 2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and that visual depiction had actually been transported and transmitted using any means and facility of interstate commerce and affecting interstate and foreign commerce, to wit: an image depicting MINOR 2 engaged in sexually explicit conduct, sent using the internet and located on an iPad Pro [S/N Q63N7DPX24].

(All in violation of Title 18, United States Code, Section 2251(a) and (e).)

**COUNT FOUR**  
**(Coercion and Enticement of a Minor)**

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about December 31, 2021, and on or about September 19, 2022, in Suffolk, Virginia, and elsewhere within the Eastern District of Virginia, the defendant, GARY OWENS, JR., using any facility and means of interstate and foreign commerce, attempted to and did knowingly persuade, induce, entice, and coerce MINOR 2 who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense, including Title 18, United States Code, Section 2251(a)/(e) (Sexual Exploitation of a Minor).

(All in violation of Title 18, United States Code, Section 2422(b).)

**COUNT FIVE**  
**(Sexual Exploitation of a Minor)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 24, 2022, in Suffolk, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, GARY OWENS, JR., attempted to and did employ, use, persuade, induce, entice, and coerce a minor, MINOR 3, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and that visual depiction had actually been transported and transmitted using any means and facility of interstate commerce and affecting interstate and foreign commerce, to wit: an image depicting MINOR 3 engaged in sexually explicit conduct, sent using the internet and located on an iPad Pro [S/N Q63N7DPX24].

(All in violation of Title 18, United States Code, Section 2251(a) and (e).)

**COUNT SIX**  
**(Coercion and Enticement of a Minor)**

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about February 22, 2022, and on or about September 24, 2022, in Suffolk, Virginia, and elsewhere within the Eastern District of Virginia, the defendant, GARY OWENS, JR., using any facility and means of interstate and foreign commerce, attempted to and did knowingly persuade, induce, entice, and coerce MINOR 3 who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense, including Title 18, United States Code, Section 2251(a)/(e) (Sexual Exploitation of a Minor).

(All in violation of Title 18, United States Code, Section 2422(b).)

**COUNT SEVEN**  
**(Sexual Exploitation of a Minor)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 27, 2022, in Suffolk, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, GARY OWENS, JR., attempted to and did employ, use, persuade, induce, entice, and coerce a minor, MINOR 4, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and that visual depiction had actually been transported and transmitted using any means and facility of interstate commerce and affecting interstate and foreign commerce, to wit: an image depicting MINOR 4 engaged in sexually explicit conduct, sent using the internet and located on an iPad Pro [S/N Q63N7DPX24].

(All in violation of Title 18, United States Code, Section 2251(a) and (e).)



**COUNT EIGHT**  
**(Coercion and Enticement of a Minor)**

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about July 14, 2022, and on or about July 27, 2022, in Suffolk, Virginia, and elsewhere within the Eastern District of Virginia, the defendant, GARY OWENS, JR., using any facility and means of interstate and foreign commerce, attempted to and did knowingly persuade, induce, entice, and coerce MINOR 4 who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense, including Title 18, United States Code, Section 2251(a)/(e) (Sexual Exploitation of a Minor).

(All in violation of Title 18, United States Code, Section 2422(b).)

**COUNT NINE**  
**(Sexual Exploitation of a Minor)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 22, 2022, in Chesapeake and Suffolk, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, GARY OWENS, JR., attempted to and did employ, use, persuade, induce, entice, and coerce a minor, MINOR 5, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and that visual depiction had actually been transported and transmitted using any means and facility of interstate commerce and affecting interstate and foreign commerce, to wit: a video file depicting MINOR 5 engaged in sexually explicit conduct, sent using the internet and located on an iPad Pro [S/N Q63N7DPX24].

(All in violation of Title 18, United States Code, Section 2251(a) and (e).)

**COUNT TEN**  
**(Coercion and Enticement of a Minor)**

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about February 22, 2022, and on or about February 24, 2022, in Chesapeake and Suffolk, Virginia, and elsewhere within the Eastern District of Virginia, the defendant, GARY OWENS, JR., using any facility and means of interstate and foreign commerce, attempted to and did knowingly persuade, induce, entice, and coerce MINOR 5 who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense, including Title 18, United States Code, Section 2251(a)/(e) (Sexual Exploitation of a Minor).

(All in violation of Title 18, United States Code, Section 2422(b).)

**COUNT ELEVEN**  
**(Sexual Exploitation of a Minor)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 31, 2022, in York County and Suffolk, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, GARY OWENS, JR., attempted to and did employ, use, persuade, induce, entice, and coerce a minor, MINOR 6, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and that visual depiction had actually been transported and transmitted using any means and facility of interstate commerce and affecting interstate and foreign commerce, to wit: an image depicting MINOR 6 engaged in sexually explicit conduct, sent using the internet and located on an iPad Pro [S/N Q63N7DPX24].

(All in violation of Title 18, United States Code, Section 2251(a) and (e).)

**COUNT TWELVE**  
**(Coercion and Enticement of a Minor)**

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 28, 2022, and on or about December 4, 2022, in York County and Suffolk, Virginia, and elsewhere within the Eastern District of Virginia, the defendant, GARY OWENS, JR., using any facility and means of interstate and foreign commerce, attempted to and did knowingly persuade, induce, entice, and coerce MINOR 6 who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense, including Title 18, United States Code, Section 2251(a)/(e) (Sexual Exploitation of a Minor).

(All in violation of Title 18, United States Code, Section 2422(b).)

**COUNT THIRTEEN**  
**(Attempted Sexual Exploitation of a Minor)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 17, 2022, in Suffolk, Virginia, and elsewhere within the Eastern District of Virginia, the defendant, GARY OWENS, JR., attempted to employ, use, persuade, induce, entice, and coerce one or more minors to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and that visual depiction had actually been transported and transmitted using any means and facility of interstate commerce and affecting interstate and foreign commerce, to wit: an image depicting a minor engaged in sexually explicit conduct, sent using the internet.

(All in violation of Title 18, United States Code, Section 2251(e).)

**COUNT FOURTEEN**  
**(Possession of Material Involving the Sexual Exploitation of Minors)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 5, 2024, in Suffolk, Virginia, and elsewhere within the Eastern District of Virginia, the defendant, GARY OWENS, JR., knowingly possessed, and attempted to possess, at least matter containing one or more visual depiction that had been shipped and transported using any means and facility of interstate and foreign commerce; and in an affecting interstate and foreign commerce; and which visual depiction was produced using materials which had been mailed and so shipped and transported, by any means, including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, to wit: digital videos and images depicting minor engaged in sexually explicit conduct and located on an iPad Pro [S/N Q63N7DPX24].

(All in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).)

## FORFEITURE NOTICE

THE GRAND JURY FURTHER FINDS THAT:

The defendant, GARY OWENS, JR., is hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of Counts One, Three, Five, Seven, Nine, Eleven, Thirteen, or Fourteen of the Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 2253: (1) any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, and any matter that contains any such visual depiction, which was produced, transported, mailed, shipped, and received in violation of this chapter; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of the offense, and any property traceable to such property.

The defendant, GARY OWENS, JR., is hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of Counts Two, Four, Six, Eight, Ten, or Twelve, of the Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 2428(a): (1) the defendant's interest in any property, real or personal, constituting or derived from any proceeds he obtained, directly or indirectly, as a result of such violation; and (2) the defendant's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation.

The property subject to forfeiture includes, but is not limited to, the following:

1. iPad Pro [S/N Q63N7DPX24]
2. Blue iPhone 15 Max
3. Apple Desktop [S/N C02NWB5JFY11]



Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office

If any property subject to forfeiture is unavailable, the United States may seek an order forfeiting substitute assets pursuant to Title 21, U.S. Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(All in accordance with Title 18, United States Code, Sections 2253 and 2428(a); Title 21 U.S. Code, Section 853(p); and Fed. R. Crim. P. 32.2(a) & 32.2(e).)

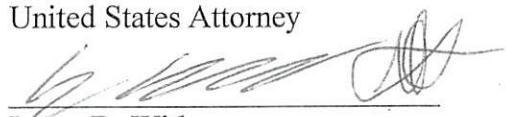
A TRUE BILL

**REDACTED COPY**

\_\_\_\_\_  
FOREPERSON

Jessica D. Aber  
United States Attorney

By:

  
\_\_\_\_\_  
Laura D. Withers  
E. Rebecca Gantt  
Assistant United States Attorneys